

The Resolution Law Group, P.C.

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November 1, 2012

VIA HAND DELIVERY

The Honorable William F. Kuntz, II, U.S.D.J.
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: ABRAHAM, et. al. v. AMERICAN HOME MORTGAGE SERVICES, et. al.
Case No. 12-cv-4686-(WFK) (JMA) (E.D.N.Y.)

FILED
CLERK
2012 NOV - 1 AM 10:03
U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

Dear Judge Kuntz:

Enclosed please find:

- One (1) original and two (2) copies of our letter-motion, dated today, along with a proposed order;
- One (1) original letter-motion, dated yesterday, which I intended to upload via ECF; and
- Proof that ECF was still not accessible as of this morning.

If chambers is unable to upload the hand-delivered letter-motion and proposed order to ECF by midday, I will circulate a PDF copy of the same to all appearing counsel.

Although not in the office today, I will be checking messages left at the number above. Alternatively, I can be reached on my cellular phone at 516-524-3299. Do not hesitate to contact me to discuss this matter.

Thank you for your courtesy in helping to resolve this issue.

Respectfully,



Janine Z. Schatz
Of Counsel

Enclosures

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DUE TO ECF OUTAGE

The Honorable William F. Kuntz, II, U.S.D.J.
United States District Court for the
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225 Cadman Plaza East
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RE: ABRAHAM, et. al. v. AMERICAN HOME MORTGAGE SERVICING, et. al.
Case No. 12-cv-4686-(WFK) (JMA) (E.D.N.Y.)

Dear Judge Kuntz:

This firm represents the Plaintiffs in the above entitled action. We write to Your Honor seeking an extension of time in which to file a Second Amended Complaint.

Due to the destruction caused by Hurricane Sandy, we will be unable to meet the deadline imposed by the court's scheduling order. (See Dckt. No. 86.)

Philip Berwish, the lead attorney on this matter, resides in central New Jersey and has been without electricity at his home and office since Monday evening. Other staff members' homes and the firm's offices have been similarly afflicted. In addition to the several days already lost, it is not clear when the situation will improve such that we may resume work on the Second Amended Complaint and submit it for our adversaries' consideration. The most recent news reports indicate that seven (7) to ten (10) days may elapse before electrical power is restored to the affected portions of the greater New York area.

Thus, we hereby respectfully request that the Second Amended Complaint filing deadline be extended by five (5) business days, or such other duration as the court sees fit. We further reserve our right to renew this motion should the extenuating circumstances persist.

Respectfully submitted,

THE RESOLUTION LAW GROUP, P.C.

By: 
Janine Z. Schatz
Of Counsel



